

**IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
AT NASHVILLE**

THE CLEVER FACTORY, INC.,

Plaintiff,

vs.

HARTFORD CASUALTY INSURANCE  
COMPANY, and PROPERTY AND  
CASUALTY INSURANCE COMPANY  
OF HARTFORD,

Defendants.

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NO. \_\_\_\_\_

JUDGE \_\_\_\_\_

**NOTICE OF REMOVAL**

1. The above-named plaintiff on the 28<sup>th</sup> day of February, 2012, filed a Complaint in the Chancery Court of Davidson County, Tennessee, against the above-named defendants bearing Docket No. 12-297-III.

2. A copy of the Summons and Complaint, which were served upon the defendants through the Tennessee Department of Commerce and Insurance, on March 2, 2012, is attached hereto and filed herewith. These are all of the process, pleadings and orders which have been served upon the defendant.

3. Plaintiff was at the time of the commencement of said action and still is a citizen and resident of the State of Tennessee and of no other state.

4. Defendants were at the time of the commencement of said action and still are corporations organized under the laws of the State of Indiana and of no other state, with its principal place of business at One Hartford Plaza, Hartford, CT 06155.

5. The amount in controversy in said action exceeds the sum or value of Seventy-Five Thousand (\$75,000.00) Dollars, exclusive of interest and costs, and is wholly between the citizens of different states and is within the jurisdiction of this Court, pursuant to the provisions of Title 28 United States Code, section 1332 and is removable to this Court pursuant to the provisions of Title 28 United States Code, section 1441.

**WHEREFORE**, defendants pray this Court accept this Notice and proceed with the action heretofore referred to in accordance with law.

**LEITNER, WILLIAMS, DOOLEY & NAPOLITAN,  
PLLC**

BY: s/ Thomas A. Williams  
Thomas A. Williams – TNBPR #: 001688  
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### **CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a copy of the within and foregoing document upon William N. Helou, MGLAW, PLLC, 2525 West End Avenue, Suite 1475, Nashville, Tennessee 37203, by mailing him a copy of the same through the United States mail in a properly addressed envelope with sufficient postage affixed to reach its destination.

This 30<sup>th</sup> day of March, 2012.

s/ Thomas A. Williams  
Thomas A. Williams